



January 12, 2017

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE**  
**PS Docket No. 07-114: *Wireless E911 Location Accuracy Requirements***

Dear Ms. Dortch:

On January 10, 2017, Rebecca Murphy Thompson and I with Competitive Carriers Association (“CCA”)<sup>1</sup> met with David Siehl, Nellie Foosaner, and Erika Olsen (via teleconference) of the Federal Communications Commission’s (“FCC” or “Commission”) Public Safety and Homeland Security Bureau (“Bureau”) to discuss the above-referenced proceeding. In compliance with requirements set forth in the *Fourth Report and Order*, CCA highlighted its members’ efforts to catalog and report aggregate live 911 call data in advance of the February 2017 deadline.<sup>2</sup>

CCA supports the FCC’s goal to evaluate compliance and performance of individual location technologies within different morphologies by acquiring live 911 call data from nationwide and non-nationwide providers.<sup>3</sup> To that end, CCA asked for clarity regarding certain aspects of the FCC’s reporting regime, and offered several recommendations to promote uniform reporting. First, CCA discussed the Commission’s expectations for organization of live 911 call data reports. CCA noted ongoing coordination with members to ensure information submitted in the February 2017 report is consistent with the *Fourth Report and Order*, to the best of its members’ abilities.

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<sup>1</sup> CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members consisting of businesses, vendors, and suppliers that serve carriers of all sizes.

<sup>2</sup> *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (rel. Feb. 3, 2015) (“*Fourth Report and Order*”).

<sup>3</sup> Nationwide CMRS providers must aggregate live 911 call data on a quarterly basis; non-nationwide providers must file on a biannual basis. See *id.* ¶¶ 136-137

In seeking to meet these requirements, CCA also highlighted certain obstacles faced by competitive carriers in obtaining the requisite data and analysis needed for the February report.<sup>4</sup> As the *Fourth Report and Order* encourages, CCA will continue to work with industry stakeholders to facilitate data collection and analysis, and agreed that a table-format will streamline the filing process for both carriers and the Commission.<sup>5</sup> For ease of submission, CCA again encouraged the Bureau to initiate a common docket or designated email address where these reports could be confidentially submitted.<sup>6</sup>

Similarly, CCA reiterated its request that the Commission release a Public Notice with specific filing instructions for submitting live 911 call data reports prior to the February deadline.<sup>7</sup> The Commission should publish ATIS's definitions for each of the morphologies – dense urban, urban, suburban, and rural – to aid competitive carriers' abilities to accurately compile live 911 call data. Further, the FCC should explicitly define its recommended formula to calculate compliance benchmarks via applicable ATIS standards. Indeed, many of CCA's members do not participate in ATIS and therefore have limited knowledge of its processes. The FCC should release in the near-term an explanatory Public Notice that highlights standards and computations needed to ensure compliance and facilitate a more transparent reporting regime.

Finally, CCA and the Commission discussed the possibility that certain content may be excluded from the February 2017 reports, consistent with current industry understanding.<sup>8</sup> CCA and its members look forward to continued work with the Commission to improve location accuracy technology and access to information for the benefit of all consumers and emergency authorities.

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<sup>4</sup> See *Ex Parte* Letter from Matthew Gerst, Director Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Jan. 9, 2017).

<sup>5</sup> See *Fourth Report and Order* ¶ 189; and *Ex Parte* Letter from Matthew Gerst, Director Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Dec. 15, 2016).

<sup>6</sup> Providers must submit these reports to the Association of Public-Safety Communications Officials, the FCC, National Emergency Number Association, and the National Association of State 911 Administrators. The Commission should streamline its submission process by identifying a single point of contact for all entities, in conjunction with a single docket or program for submitting all reports. See *Fourth Report & Order* ¶ 36; and *Ex Parte* Letter from Courtney Neville, Policy Counsel, CCA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Oct. 21, 2016).

<sup>7</sup> See *id.*

<sup>8</sup> The Commission's *Fourth Report & Order* requires reporting of aggregate live 911 call data, and states that "data [reported] on a more granular basis will be used for evaluation and not for compliance purposes." Consistent with FCC rules, Commission staff confirmed CCA's understanding that granular data included in carriers' live 911 call data reports only will be used to evaluate the performance of individual location technologies within different morphologies, and cannot be used against carriers' compliance demonstrations. CCA will continue working with members to ensure future reports following the February 2017 deadline contain pertinent information consistent with FCC expectations and competitive carriers' capabilities and resources. See *Fourth Report & Order* ¶¶ 6, 31. See also, e.g., 47 C.F.R. §§ 20.18(g)(1)(vi), (g)(3), (p).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

*/s/ Courtney Neville*

Courtney Neville  
Policy Counsel  
Competitive Carriers Association

cc (via email): David Siehl  
Erika Olsen  
Nellie Foosaner